

# HO & P | HEYGOOD, ORR & PEARSON

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October 16, 2013

Honorable George L. Russell, III  
United States District Judge  
District of Maryland  
101 West Lombard Street  
Baltimore, Maryland, 21201

Re: *Crystal Blankenship vs. Black & Decker (U.S.) Inc. et al*  
Civil Action No. GLR-13-2522

Dear Judge Russell,

Per your order dated October 15, 2013, the parties jointly submit this letter and address the seven points set forth below.

**1. Whether the parties object to having the case transferred to a U.S. Magistrate Judge for all further proceedings.**

There is not unanimous consent to have case transferred to a U.S. Magistrate Judge for all further proceedings.

**2. Whether you would like to participate in a settlement conference either before or after the completion of discovery.**

The parties believe third-party mediation or a settlement conference after the completion of discovery would be beneficial.

**3. Whether discovery of electronically stored information is expected to be problematic;**

The parties have no expectation that discovery of electronically store information will be problematic.

**4. Whether you would like to defer any of the expert discovery until after summary judgment motions are resolved.**

The parties do not believe this is necessary.

**5. Any changes to the dates in the preliminary scheduling order;**

March 3, 2014	Moving for joinder of additional parties and amendment of pleadings
March 17, 2014	Plaintiff's Rule 26(a)(2) disclosures
April 28, 2014	Defendant's Rule 26(a)(2) disclosures
May 12, 2014	Plaintiff's rebuttal Rule 26(a) (2) disclosures
May 19, 2014	Rule 26(e)(2) supplementation of disclosures and responses
May 29, 2014	Discovery deadline; submission of status report
June 5, 2014	Request for Admission
June 30, 2014	Dispositive pretrial motions deadline

**6. Whether the allocated deposition hours are sufficient, and**

The allocated deposition hours are sufficient.

**7. Setting a trial date on the Court's calendar and determining its likely duration.**

The parties request a trial in October 2014 and expect such a trial will last 7-10 days.

Respectfully submitted,



Lindsey M. Craig

cc: Dan Lanier